

# Exhibit D

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

THE STATE OF LOUISIANA,  
By and through its Attorney General,  
JEFF LANDRY,

THE STATE OF ARIZONA,  
By and through its Attorney General,  
MARK BRNOVICH,

THE STATE OF MISSOURI,  
By and through its Attorney General,  
ERIC S. SCHMITT,

PLAINTIFFS,

v.

XAVIER BECERRA, in his official  
capacity as Secretary of Health and  
Human Services; et al.,

DEFENDANTS.

CIVIL ACTION No. \_\_\_\_\_

**Declaration of Maddie M. Green**

1. My name is Maddie M. Green. I am an Assistant Attorney General for Special Litigation in the Office of the Missouri Attorney General. I am over 21 years of age and competent to testify to the matters asserted herein.
2. The Biden administration is reportedly anticipating a “mass migration event” along the Southwest Border once Title 42 officially ends. Muzaffar Chishti and Jessica Bolter, *Controversial U.S. Title 42 Expulsions Policy is Coming to an End, Bringing New Border Challenges*, Migration Policy Institute (Mar. 31, 2022) <https://www.migrationpolicy.org/article/title-42-expulsions-policy>.

3. On March 29, 2022, Department of Homeland Security (“DHS”) officials said that a decision to lift Title 42 “will likely cause a significant increase in arrivals” along the Southwest Border. Joel Rose, *DHS officials brace for a new surge at the border if pandemic restrictions are lifted*, NPR (Mar. 29, 2022), <https://www.npr.org/2022/03/29/1089551424/dhs-officials-brace-for-a-new-surge-at-the-border-if-pandemic-restrictions-are-l>. DHS officials are preparing for the possibility of 18,000 border apprehensions per day – more than twice the average number of daily apprehensions last summer. *Id.*
4. On March 30, 2022, the DHS released their strategy to address an “increase in the number of border encounters” once Title 42 is no longer in place. Department of Homeland Security, *FACT SHEET: DHS Preparations for a Potential Increase in Migration* (March 30, 2022), <https://www.dhs.gov/news/2022/03/30/fact-sheet-dhs-preparations-potential-increase-migration>.
5. In a letter to DHS Secretary Alejandro Mayorkas and Department of Health and Human Services (“HHS”) Secretary Xavier Becerra, the Texas Congressional Delegation warned that ending Title 42 would produce “catastrophic results” at the Southwest Border.  
<https://www.cornyn.senate.gov/sites/default/files/Texas%20Delegation%20Letter%20to%20DHS%20and%20HHS%20on%20Title%2042%20Cancellation.pdf>  
f.

6. Reportedly, U.S. intelligence officials are bracing for an influx of more than 170,000 migrants at the Mexico border if Title 42 is lifted. Jonathan Swan & Stef W. Kight, *Scoop: Biden officials fear “mass migration event” if COVID policies end*, Axios (Mar. 17, 2022), <https://wwwaxios.com/biden-border-mexico-migrants-title-42-a91b6441-2197-463f-ab1f-2435824a9566.html>. DHS estimates 25,000 migrants are waiting in shelters just south of the border for Title 42 to end. *Id.*
7. The National Border Council has warned that “illegal immigration is going to explode even more if Title 42 goes away.” Callie Patteson, *Biden administration to scrap Title 42 border policy by May 23 despite warning: reports*, NY Post (Mar. 30, 2022), <https://nypost.com/2022/03/30/white-house-to-scrap-title-42-by-may-23-despite-border-democrat-warnings/>.
8. Missouri spent an average of \$10,654 per student in school year 2019-2020 regardless of immigration status. Missouri Department of Elementary and Secondary Education, State Report Card – 2020 Data, [https://apps.dese.mo.gov/MCDS/Reports/SSRS\\_Print.aspx?Reportid=84d85ca8-c722-4f9b-9935-70d36a53cf54](https://apps.dese.mo.gov/MCDS/Reports/SSRS_Print.aspx?Reportid=84d85ca8-c722-4f9b-9935-70d36a53cf54). A true and correct copy of this publication is attached hereto as Exhibit A.
9. A 2018 study shows that an estimated 3,000 illegal alien school-aged children were enrolled in Missouri schools. Migration Policy Institute, Profile of the Unauthorized Population: Missouri, <https://www.migrationpolicy.org/data/unauthorized-immigrant->

population/state/MO. A true and correct copy of this publication is attached hereto as Exhibit B.

10. Statistically, for every 1,000 aliens who remain unlawfully in the United States, 56 end up residing in Missouri. Pew Research Center, *U.S. unauthorized immigrant population estimates by state, 2016* (Feb. 5, 2019), <https://www.pewresearch.org/hispanic/interactives/u-s-unauthorized-immigrants-by-state/>. A true and correct copy of this publication is attached hereto as Exhibit C.

11. According to records of Missouri's Department of Social Services, Missouri expended \$361,702 in emergency medical care costs for treatment of ineligible aliens during Fiscal Year 2020.

12. Missouri's Department of Revenue ("DOR") uses the Systemic Alien Verification of Entitlements ("SAVE") system to verify unlawful individuals' lawful immigration status at a cost of \$0.80 for the initial inquiry and \$0.50 for any additional inquiries. In state fiscal year 2020, DOR paid \$30,114.11 for SAVE inquiries.

13. While applicants for drivers' licenses are charged a fee, no part of that fee is specifically designated for SAVE costs and DOR must annually request appropriations from the state legislature to cover the costs of SAVE inquiries.

I swear or affirm under penalty of perjury that the foregoing is true and correct.

Dated: April 11, 2022

Maddie M. Green

Maddie M. Green

# **EXHIBIT A**

## **Green Declaration**

## State Report Card - UPDATED! 2020 Data

School Year    of 1        

## Document Map

**(15) Current Expenditures per Pupil - State Level**

(Data as of 1/25/2021)

 State Report Card

Missouri	2020
A. Membership *	875,043.19
<b>State Level Per-Pupil Expenditures</b>	
B. Federal	\$782
C. State/Local	\$10,654
D. State Level Per-Pupil Total (Sum of B+C)	\$11,436

(Excluded expenditures include capital outlay, debt service, community services, non-instruction/support, adult education, and Title I expenditures.  
Impact aid is considered local expenditures.)

## (9) Staffing Ratios

**Definition**

## (10) Years of Experience of Professional Staff

## (11) Disproportionate Rates of Access to Educators

**(16) Average Tax Rate Per District**

(Data as of 11/17/2020)

MISSOURI	2020
Average Teacher Salaries	\$3.4392
Average Administrator Salaries	\$0.1214
Current Expenditures per Pupil - Building Level	\$0.4951
Assessed Valuation Capital Projects	\$0.0890

## (18) Sources of Revenue

**Definition**

## (19) Missouri Assessment Program (MAP) Results

**(17) Assessed Valuation**

(Data as of 11/17/2020)

## (21) ACT Results

MISSOURI	2020
Disciplinary Actions Total	\$110,589,446,990

## (24) How Do Student Groups Perform?

**Definition**

## (25) Students in Gifted Education Program

## (26) English Learner Proficiency Status

**(18) Sources of Revenue**

(Data as of 11/17/2020)

## (27) Comprehensive and Targeted Status

MISSOURI	2020
Local	48.19%
State	40.74%
Federal	11.07%

**Definition****(19) Missouri Assessment Program (MAP) Results**

On March 19, 2020, in response to the COVID-19 pandemic, the Department of Elementary and Secondary Education (DESE) (MAP) assessments would not be administered, including Grade-Level (GLA), End-of-Course (EOC) and Missouri Assessment available for the 2020 school year.

## **EXHIBIT B**

### **Green Declaration**



MENU


[Home](#) » [Data Hub](#) » [Unauthorized Immigrant Population](#)

## Profile of the Unauthorized Population: Missouri

Demographics	Estimate	% of Total
Unauthorized Population	54,000	100%
<b>Top Countries of Birth</b>		
Mexico	22,000	41%
China/Hong Kong	4,000	7%
Guatemala	4,000	7%
-	-	-
-	-	-
<b>Regions of Birth</b>		
Mexico and Central America	30,000	55%
Caribbean	-	-
South America	-	-
Europe/Canada/Oceania	6,000	11%
Asia	12,000	23%
Africa	3,000	5%
<b>Years of U.S. Residence</b>		
Less than 5	15,000	27%
5 to 9	12,000	22%
10 to 14	12,000	22%
15 to 19	12,000	22%
20 or more	4,000	8%
<b>Age</b>		
Under 16	3,000	5%
16 to 24	10,000	19%

Profile of the Unauthorized Population: Missouri		
Category	Estimate	% of Total
25 to 34	18,000	33%
35 to 44	15,000	27%
45 to 54	6,000	11%
55 and over	3,000	5%
<b>Gender</b>		
Female	27,000	49%
<b>Family</b>	<b>Estimate</b>	<b>% of Total</b>
<b>Parental Status</b>		
Population ages 15 and older	52,000	100%
Reside with at least one U.S.-citizen child under 18	21,000	40%
Reside with noncitizen children only under 18	3,000	5%
Reside with no children	29,000	55%
<b>Marital Status</b>		
Population ages 15 and older	52,000	100%
Never married	19,000	37%
Married to a U.S. citizen	11,000	20%
Married to a legal permanent resident (LPR)	3,000	6%
Married to non-U.S. citizen/non-LPR	12,000	24%
Divorced, separated, widowed	7,000	14%
<b>Education and Language</b>	<b>Estimate</b>	<b>% of Total</b>
<b>School Enrollment of Children and Youth</b>		
Population ages 3 to 17	3,000	100%
Enrolled	3,000	83%
Not enrolled	-	-
Population ages 3 to 12	-	-
Enrolled	-	-
Not enrolled	-	-
Population ages 13 to 17	-	-
Enrolled	-	-
Not enrolled	-	-
Population ages 18 to 24	10,000	100%

Enrolled	5,000	48%
Not enrolled	5,000	52%
<b>Educational Attainment of Adults</b>		
Population ages 25 and older	41,000	100%
0-5 grade	5,000	12%
6-8 grade	5,000	11%
9-12 grade	4,000	11%
High school diploma or equivalent	9,000	22%
Some college or associate's degree	5,000	13%
Bachelor's, graduate, or professional degree	13,000	32%
<b>English Proficiency</b>		
Population ages 5 and older	54,000	100%
Speak only English	7,000	12%
Speak English "very well"	19,000	35%
Speak English "well"	13,000	24%
Speak English "not well"/"not at all"	16,000	29%
<b>Top 5 Languages Spoken at Home</b>		
Population ages 5 and older	54,000	100%
Spanish	30,000	55%
English	7,000	12%
Chinese	4,000	7%
-	-	-
-	-	-
<b>Workforce</b>		<b>Estimate</b>
		<b>% of Total</b>
<b>Labor Force Participation</b>		
Civilian population ages 16 and older	51,000	100%
Employed	33,000	64%
Unemployed	2,000	5%
Not in the labor force	16,000	31%
<b>Top Industries of Employment</b>		
Civilian employed population ages 16 and older	33,000	100%
Accommodation and food services, arts, entertainment, and recreation	6,000	19%

Construction	5,000	16%
Manufacturing	4,000	14%
Professional, scientific, management, administrative, and waste management services	3,000	10%
Health services and social assistance	3,000	9%
<b>Economics</b>	<b>Estimate</b>	<b>% of Total</b>
<b>Family Income</b>		
Below 50% of the poverty level	9,000	16%
50-99% of the poverty level	7,000	14%
100-149% of the poverty level	8,000	14%
150-199% of the poverty level	6,000	11%
At or above 200% of the poverty level	24,000	45%
<b>Access to Health Insurance</b>		
Uninsured	26,000	48%
<b>Home Ownership*</b>		
Homeowner	19,000	35%

*Source:* These 2018 data result from Migration Policy Institute (MPI) analysis of U.S. Census Bureau data from the pooled 2014–18 American Community Survey (ACS) and the 2008 Survey of Income and Program Participation (SIPP), weighted to 2018 unauthorized immigrant population estimates provided by Jennifer Van Hook of The Pennsylvania State University.

*Note:* For U.S., state, and county estimates of the unauthorized population potentially eligible for the Deferred Action for Childhood Arrivals (DACA) program, [click here](#).

*Data-related notes*

\* “Homeowners” are unauthorized immigrants residing in homes that are owned, not rented.

+ Includes the following Colorado counties: Adams, Broomfield, Clear Creek, Douglas, Elbert, Gilpin, and Jefferson, as well as portions of Arapahoe, Boulder, and Weld counties.

++ NECTAs refer to New England City and Town Areas, geographic entities defined by the U.S. Census Bureau for use as alternatives to counties in the six-state New England region.

1. Estimate for China includes Hong Kong but excludes Taiwan; estimate for Korea includes South Korea and North Korea.

2. "School Enrollment of Children and Youth" refers to unauthorized immigrants who reported attending school or college at any time in the three months prior to the survey.
3. For languages, "Chinese" includes Mandarin, Cantonese, and other Chinese languages; "English" includes English, Jamaican Creole, Krio, Pidgin Krio, and other English-based Creole languages; "French" includes French, Patois, and Cajun; "Pacific Island languages" includes Ilocano, Samoan, Hawaiian, Sebuano, Chamorro, Guamanian, Marshallese, Trukese, Tongan, and other Austronesian languages, but excludes Tagalog and Filipino, which are reported separately; "Portuguese" includes Portuguese and Cape Verdean Creole; "Sub-Saharan African" includes Swahili or other Bantu languages, Mande, Fulani, Kru, and other unspecified African languages; "Tagalog" includes Tagalog and Filipino.
4. For industries, "Other services" are miscellaneous services, not including the following services listed separately: (1) professional, scientific, management, administrative, and waste management services; (2) educational services; (3) health and social services; and (4) accommodation and food services, arts, entertainment, and recreation.
5. "-" estimates are zero, not applicable, or not displayed due to small sample size.
6. Percentages may not add up to 100 due to rounding.

*Methodology in Brief:*

MPI's method uses information from the SIPP to assign legal status to noncitizens in the ACS. In the SIPP, noncitizens report whether they currently have lawful permanent resident (LPR) status—i.e., a green card. Those without LPR status may be recent refugees, temporary visitors (e.g., international students or high-skilled H-1B workers), or unauthorized immigrants. Our method maps characteristics such as country of birth, year of U.S. entry, age, gender, and educational attainment between the two surveys, and those noncitizens in the ACS who have characteristics similar to those reporting LPR status in the SIPP are coded as LPRs in the ACS. The remaining noncitizens—who are similar in characteristics to those not reporting LPR status in the SIPP—are classified as either unauthorized or legal temporary migrants, depending on whether they meet the qualifications for H-1B and the other temporary visa classifications. Estimates of unauthorized immigrants are weighted to match control totals (benchmarks) for immigrants from a set of origin countries and world regions. These control totals are calculated by subtracting the number of legal immigrants from the total of all immigrants for each country and region that are captured in the ACS data. The number of legal immigrants is estimated by adding up all legal admissions from each country and region in every year—using Department of Homeland Security administrative data—and then reducing this number to account for deaths and emigration of legal immigrants. Finally, the unauthorized immigrant population estimates are adjusted upward slightly to account for the undercount of this population in the ACS.

MPI's overall method was developed in consultation with James Bachmeier of Temple University and Jennifer Van Hook of The Pennsylvania State University, Population Research Institute. For more detail on the methods, see MPI, "[MPI Methodology for Assigning Legal Status to Noncitizen Respondents in U.S. Census Bureau Survey Data](#)." The control totals were developed by Jennifer Van Hook. These estimates have the same sampling and coverage errors as any other survey-based estimates that rely on ACS and other Census Bureau data.

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## DEMOGRAPHICS

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## FAMILY

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### EDUCATION AND LANGUAGE

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### WORKFORCE

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### ECONOMICS

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## **EXHIBIT C**

### **Green Declaration**

## Hispanic Trends

MAIN

MORE ▾

FEBRUARY 5, 2019

# U.S. unauthorized immigrant population estimates by state, 2016

Pew Research Center estimates that 10.7 million unauthorized immigrants, the lowest level in a decade, lived in the U.S. in 2016. Select a measure from the dropdown below to view state by state data on unauthorized immigration.

POPULATIONLABOR FORCE

### Unauthorized immigrant population, 2016

A majority of U.S. unauthorized immigrants live in just six states – including California (with the largest population at 2.2 million), Texas, Florida, New York, New Jersey and Illinois. There are eight states with 5,000 or fewer unauthorized immigrants. For more, see our report, "[U.S. Unauthorized Immigrant Total Dips to Lowest Level in a Decade](#)," and our [interactive charts on unauthorized immigrant population trends](#).

#### ► Methodology

*Unauthorized immigrant population, 2016*

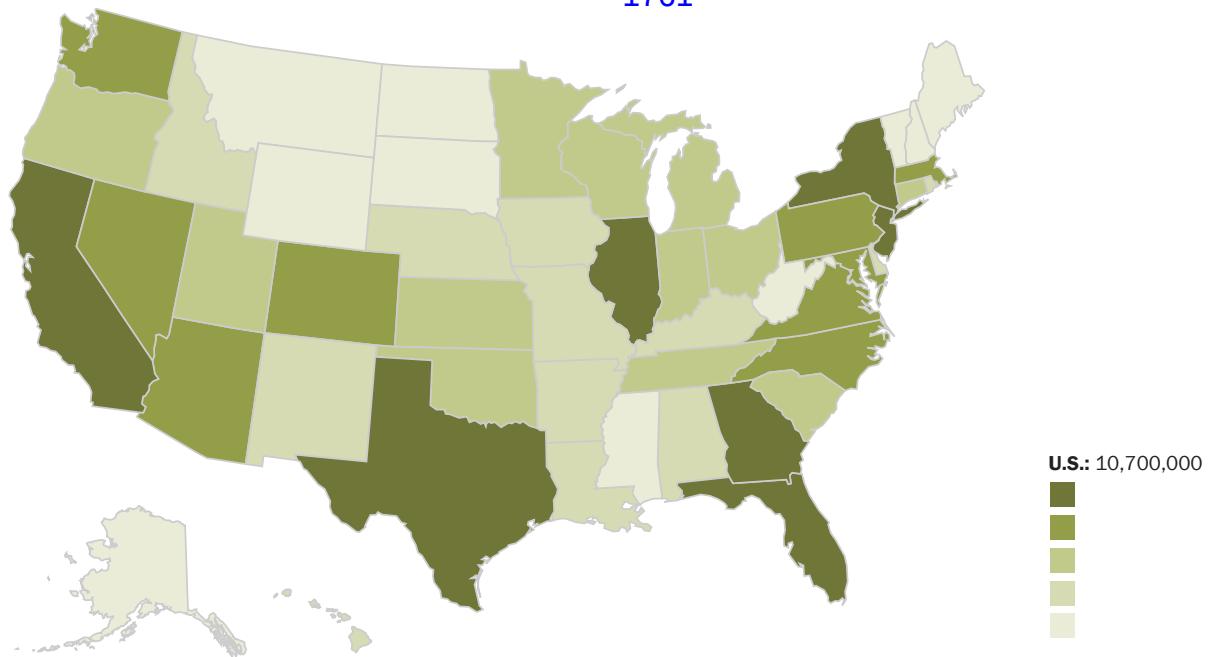


Pew Research Center

When you're finished with our website, would you be willing to answer a quick question?

Yes

No



Note: All numbers are rounded; see [Methodology](#) for rounding rules.

Source: Pew Research Center estimates based on augmented U.S. Census Bureau data. See [Methodology](#) for details.

State	Unauthorized immigrant population	Unauthorized immigrant % of population	Unauthorized immigrant % of all immigrants	% of K-12 students with unauthorized immigrant parent(s)	Mexican % of unauthorized immigrants	% of unauthorized immigrant adults in U.S. 5 years or less	Change in unauthorized immigrant population, 2007 to 2016
<b>U.S.</b>	10,700,000	3.3%	24%	7.6%	51%	18%	-1,550,000
<b>Alabama</b>	55,000	1.2%	34%	3.3%	59%	13%	-15,000
<b>Alaska</b>	5,000	1.0%	13%	0.5%	23%	43%	Not sig.
<b>Arizona</b>	275,000	3.9%	28%	10.7%	78%	13%	-220,000
<b>Arkansas</b>	55,000	1.9%	41%	6.3%	64%	15%	-10,000
<b>California</b>	2,200,000	5.6%	20%	13.3%	69%	10%	-550,000
<b>Colorado</b>	190,000	3.4%	34%	10.6%	70%	14%	Not sig.
<b>Connecticut</b>	120,000	3.5%	23%	6.9%			g.
<b>Delaware</b>	30,000	3.0%	31%	7.0%			g.
<b>District of Columbia</b>	25,000	3.8%	28%	9.0%			g.
<b>Florida</b>	775,000	3.8%	18%	7.1%			0



Pew Research Center

When you're finished with our website, would you be willing to answer a quick question?

Yes

No

State	Unauthorized immigrant population	Unauthorized immigrant % of population	Unauthorized immigrant % of all immigrants	% of K-12 students with unauthorized immigrant parent(s)	Mexican % of unauthorized immigrants	% of unauthorized immigrant adults in U.S. 5 years or less	Change in unauthorized immigrant population, 2007 to 2016
<b>Georgia</b>	400,000	3.8%	36%	8.6%	49%	17%	Not sig.
<b>Hawaii</b>	45,000	3.3%	17%	7.0%	6%	34%	Not sig.
<b>Idaho</b>	35,000	2.2%	37%	5.7%	79%	19%	Not sig.
<b>Illinois</b>	400,000	3.2%	22%	7.8%	71%	11%	-140,000
<b>Indiana</b>	100,000	1.5%	29%	4.2%	59%	23%	Not sig.
<b>Iowa</b>	50,000	1.7%	31%	4.2%	56%	26%	Not sig.
<b>Kansas</b>	75,000	2.6%	35%	7.6%	69%	16%	Not sig.
<b>Kentucky</b>	35,000	0.8%	22%	1.6%	48%	24%	Not sig.
<b>Louisiana</b>	70,000	1.5%	36%	2.7%	28%	23%	+15,000
<b>Maine</b>	<5,000	0.4%	9%	0.5%	-	-	Not sig.
<b>Maryland</b>	275,000	4.5%	29%	8.5%	9%	22%	+60,000
<b>Massachusetts</b>	250,000	3.8%	22%	6.1%	2%	29%	+35,000
<b>Michigan</b>	100,000	1.0%	15%	2.2%	29%	27%	-45,000
<b>Minnesota</b>	95,000	1.7%	20%	3.8%	50%	21%	Not sig.
<b>Mississippi</b>	20,000	0.7%	35%	1.8%	59%	21%	Not sig.
<b>Missouri</b>	60,000	1.0%	23%	2.7%	45%	20%	Not sig.
<b>Montana</b>	<5,000	0.3%	12%	0.1%	-	-	Not sig.
<b>Nebraska</b>	60,000	3.1%	41%	9.2%	62%	14%	Not sig.
<b>Nevada</b>	210,000	7.1%	35%	20.2%			0
<b>New Hampshire</b>	10,000	0.7%	13%	0.9%			0
<b>New Jersey</b>	475,000	5.2%	22%	8.8%			0
<b>New Mexico</b>	60,000	2.8%	29%	7.9%			0



Pew Research Center

When you're finished with our website, would you be willing to answer a quick question?

 Yes

 No

State	Unauthorized immigrant population	Unauthorized immigrant % of population	Unauthorized immigrant % of all immigrants	% of K-12 students with unauthorized immigrant parent(s)	Mexican % of unauthorized immigrants	% of unauthorized immigrant adults in U.S. 5 years or less	Change in unauthorized immigrant population, 2007 to 2016
<b>New York</b>	725,000	3.6%	15%	6.6%	24%	20%	-300,000
<b>North Carolina</b>	325,000	3.1%	39%	8.9%	56%	16%	Not sig.
<b>North Dakota</b>	5,000	0.7%	23%	1.7%	-	-	Not sig.
<b>Ohio</b>	90,000	0.8%	17%	1.4%	25%	33%	Not sig.
<b>Oklahoma</b>	85,000	2.2%	38%	6.4%	78%	15%	Not sig.
<b>Oregon</b>	110,000	2.6%	26%	8.2%	69%	16%	-40,000
<b>Pennsylvania</b>	170,000	1.3%	19%	2.4%	21%	31%	Not sig.
<b>Rhode Island</b>	30,000	2.8%	19%	6.8%	8%	28%	Not sig.
<b>South Carolina</b>	85,000	1.7%	35%	4.4%	54%	20%	Not sig.
<b>South Dakota</b>	5,000	0.7%	19%	1.2%	-	-	Not sig.
<b>Tennessee</b>	130,000	2.0%	38%	5.2%	56%	23%	Not sig.
<b>Texas</b>	1,600,000	5.7%	33%	13.3%	73%	16%	Not sig.
<b>Utah</b>	95,000	3.2%	38%	7.5%	71%	14%	Not sig.
<b>Vermont</b>	<5,000	0.1%	4%	0.2%	-	-	Not sig.
<b>Virginia</b>	275,000	3.4%	27%	6.9%	12%	23%	Not sig.
<b>Washington</b>	240,000	3.3%	23%	8.9%	56%	17%	Not sig.
<b>West Virginia</b>	<5,000	0.2%	14%	0.5%	-	-	Not sig.
<b>Wisconsin</b>	75,000	1.3%	24%	3.6%	70%	15%	Not sig.
<b>Wyoming</b>	5,000	1.2%	32%	3.9%			



When you're finished with our website, would you be willing to answer a quick question?

Yes

No